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1	HUGH F. BANGASSER, (<i>PRO HAC VICE</i>) RAMONA M. EMERSON, (<i>PRO HAC VICE</i>)	
2	CHRISTOPHER M. WYANT, (<i>PRO HAC VICE</i>) K&L GATES LLP	
3	925 Fourth Avenue, Suite 2900 Seattle, WA 98104-1158	
4	Phone: (206) 623-7580 Fax: (206) 623-7022	
5	JEFFREY L. BORNSTEIN, State Bar No. #99358	
6	K&L Gates LLP Four Embarcadero Center, Suite 1200	
7 8	San Francisco, CA 94111 Phone: (415) 249-1059 Fax: (415) 882-8220	
9	Attorneys for Defendants HANNSTAR DISPLAY CORPORATION	
10 11	[Additional moving parties and counsel lis on signature pages]	ted
12	UNITED STAT	ES DISTRICT COURT
13	NORTHERN DISTRICT OF CALIFORNIA	
14	(SAN FRAN	NCISCO DIVISION)
15		
16 17	IN RE: TFT-LCD (FLAT PANEL) ANTITRUST LITIGATION	No. 3:07-md-1827 SI MDL No. 1827
18	This Document Relates to Individual Case	STIPULATION AND <u>[PROPOSED]</u>
19	No. 10-cv-4572 SI	ORDER RE DISCOVERY AND MOTION TO COMPEL DEADLINES
20	BEST BUY CO., INC., et al.,	Honorable Susan Illston
21	Plaintiffs,	
22	v.	
23	AU OPTRONICS CORPORATION, et al.,	
24	Defendants.	
25		
26		lants, through the undersigned counsel, request that
27	the Court enter the following stipulated order	•
28		STIPULATION AND ORDER RE DISCOVERY AND MOTION TO COMPEL DEADLINES

STIPULATION

WHEREAS discovery closed in this case on December 8, 2011, as set forth in the Stipulation and Order Modifying Pretrial Schedule for "Track One" Direct Action Plaintiff and State Attorney General Actions (Dkt. No. 3110, the "Scheduling Order");

WHEREAS the parties submitted a Stipulation and Proposed Order to the Court extending the close of fact discovery set forth in the Scheduling Order for the limited purpose of extending the deadline for Best Buy and certain other Direct Action Plaintiffs in Track One to respond to discovery requests served by defendants between October 31 and November 4, 2011, as well as negotiating the proper scope of those responses;

WHEREAS Best Buy and Stipulating Defendants are currently meeting and conferring concerning various issues related to: (1) Best Buy's responses to the Stipulating Defendants' written discovery served by Best Buy on or before December 2, 2011; (2) Best Buy's production of documents and responses to transactional data questions as of December 8, 2011; and (3) the depositions of certain Best Buy employees or former employees that Defendants intend to conduct (collectively, "Best Buy's Discovery Responses").

WHEREAS Best Buy and Stipulating Defendants hope to resolve some or all of these issues informally, without the need to file motions to compel and seek the Court's involvement;

WHEREAS the current deadline for parties to file motions to compel with respect to Best Buy's Discovery Responses or Defendants' Discovery Responses is December 15, 2011; and

WHEREAS in an effort to facilitate the informal resolution of any disputes, the parties wish to extend the deadline for Defendants to file any motions to compel with respect to Best Buy's Discovery Responses through January 13, 2012;

NOW, THEREFORE, the Parties, through their undersigned respective counsel, stipulate and agree as follows:

1. The deadline for the Stipulating Defendants to file any motion to compel with respect to Best Buy's Discovery Responses is extended through and including January 13, 2012.

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1 2 3 4 5 6 7 8	July 12 Stipulation, for close of fact dis until January 31, 2012 solely for the limit	the Pretrial and Trial Schedule Order, as modified by the covery in the above-captioned action is hereby extended ited purpose of permitting Defendants to take depositions tipulation does not extend the discovery cut-off for any ROBINS KAPLAN MILLER & CIRESI, LLP
9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24		By: /s/ David Martinez David Martinez Roman M. Silberfeld (Bar No. 62783) David Martinez (Bar No. 193183) 2049 Century Park East, Suite 3400 Los Angeles California, 90067-3208 Phone: (310) 552-0130 Fax: (310) 229-5800 DMartinez@rkmc.com Attorneys for Plaintiffs K&L GATES LLP By: /s/ Christopher Wyant Hugh F. Bangasser, (Pro Hac Vice) Ramona M. Emerson, (Pro Hac Vice) Christopher M. Wyant, (Pro Hac Vice) K&L GATES LLP 925 Fourth Avenue, Suite 2900 Seattle, WA 98104-1158 Phone: (206) 623-7580 Fax: (206) 623-7022 JEFFREY L. BORNSTEIN, STATE BAR NO. 99358 K&L GATES LLP Four Embarcadero Center, Suite 1200 San Francisco, CA 94111
25262728		Phone: (415) 249-1059 Fax: (415) 882-8220 Attorneys for Defendant HANNSTAR DISPLAY CORPORATION
		STIPULATION AND ORDER RE DISCOVERY AND

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1	NOSSAMAN LLP
2	
3	By: <u>/s/ Christopher Nedeau</u> Christopher A. Nedeau
4	Christopher A. Nedeau (Bar No. 81297)
5	50 California Street, 34th Floor San Francisco, CA 94111
6	Tel: (415) 398-3600 Fax: (415) 398-2438
7	Attorneys for Defendants
8	AU OPTRONICS CORPORATION AND AU OPTRONICS CORPORATION
9	AMERICA
10	
11	HILLIS CLARK MARTIN & PETERSON P.S.
12	By: /s/ Michael R. Scott
13	Michael R. Scott (pro hac vice) Michael J. Ewart (pro hac vice)
14	Hillis Clark Martin & Peterson P.S. 1221 Second Avenue, Suite 500
15	Seattle WA 98101-2925 Telephone: (206) 623-1745
16	Facsimile: (206) 623-7789 mrs@hcmp.com; mje@hcmp.com
17	Attorneys for Defendants CHI MEI
18	CORPORATION, CHIMEI INNOLUX CORPORATION (F/K/A CHI MEI
19	OPTOELECTRONICS CORPORATION),
20	CHI MEI OPTOELECTRONICS USA, INC., CMO JAPAN CO., LTD., NEXGEN
21	MEDIATECH, INC. AND NEXGEN MEDIATECH USA, INC.
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	. STIPULATION AND ORDER RE DISCOVERY AND

Case 3:07-md-01827-SI Document 4394 Filed 12/19/11 Page 5 of 8 1 MORRISON & FOERSTER LLP 2 3 By: /s/ Stephen Freccero Stephen P. Freccero 4 5 Melvin R. Goldman (Bar No. 34097)) Stephen P. Freccero (Bar No. 131093) Derek F. Foran (Bar No. 224569) 6 425 Market Street San Francisco, CA 94105-2482 7 Tel: (415) 268-7000 8 Fax: (415) 268-7522 9 Attorneys for Defendants **EPSON IMAGING DEVICES** CORPORATION, EPSON 10 ELECTRONICS AMERICA, INC. 11 12 13 MORGAN, LEWIS & BOCKIUS LLP 14 15 By: /s/ Kent Roger Kent M. Roger (Bar No. 95987) 16 One Market, Spear Street Tower San Francisco, CA 94105 17 Tel: (415) 442-1140 Fax: (415) 442-1001 18 Attorneys for Defendants 19 HITACHI, LTD., HITACHI DISPLAYS, LTD., HITACHI ELECTRONIC 20 DEVICES (USA), INC. 21 22 23 24 25 26 27 28

Case 3:07-md-01827-SI Document 4394 Filed 12/19/11 Page 6 of 8 1 PAUL HASTINGS LLP 2 By: /s/ Holly House 3 Holly House (SBN 136045) Kevin C. McCann (SBN 120874) 4 55 Second Street, Twenty-Fourth Floor 5 San Francisco, CA 94105-3441 (415) 856-7000 / (415) 856-7100 6 hollyhouse@paulhastings.com kevinmccan@paulhastings.com 7 Attorneys for Defendants 8 LG DISPLAY CO., LTD., and LG DISPLAY AMERICA, INC. 9 10 11 PILLSBURY WINTHROP SHAW PITTMAN LLP 12 13 By /s/ John Grenfell 14 John M. Grenfell 15 John M. Grenfell (State Bar No. 88500) Jacob R. Sorensen (State Bar No. 209134) 16 50 Fremont Street San Francisco, CA 94105 17 Tel: (415) 983-1000 Fax: (415) 983-1200 18 Attorneys for Defendants 19 SHARP CORPORATION AND SHARP **ELECTRONICS CORPORATION** 20 21 22 23 24 25 26 27 28

Case 3:07-md-01827-SI Document 4394 Filed 12/19/11 Page 7 of 8 1 GIBSON DUNN & CRUTCHER LLP 2 3 By: /s/ Rachel Brass Rachel S. Brass 4 5 Joel S. Sanders (Bar No. 107234) Rachel S. Brass (Bar No. 219301) Rebecca Justice Lazarus (Bar No. 227330) 6 555 Mission Street, Suite 3000 San Francisco, CA 94105-2933 7 Tel: (415) 393-8200 8 Fax: (415) 393-8306 9 Attorneys for Defendants CHUNGHWA PICTURE TUBES, LTD. AND TATUNG COMPANY OF 10 AMERICA, INC. 11 12 13 Pursuant to General Order 45, Part X-B, the filer attests that concurrence in the 14 filing of this document has been obtained from the above-referenced counsel. 15 16 17 **ORDER** 18 Having considered the foregoing stipulation, and good cause appearing, 19 IT IS SO ORDERED. 20 21 12/16/11 22 Date Entered 23 24 25

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1 2	CERTIFICATE OF SERVICE BY E-MAIL (Federal Rules of Civil Procedure Rule 5(b))
	(1 edetal reales of Civil 1 locedule reale 3(0))
3	I declare that I am employed with the law firm of K&L Gates, LLP, whose address is 925 4 th Avenue, Suite 2900, Seattle, Washington 98104-1158. I am not a party to the case,
5	and I am over the age of eighteen years.
6	I further declare that on December 14, 2011, I served a copy of:
7	STIPULATION AND [PROPOSED] ORDER RE DISCOVERY AND MOTION TO COMPEL DEADLINES
8	by electronically mailing a true and correct copy to all parties of record through the CM-ECF system in accordance with Federal Rules of Civil Procedure Rule 5(b).
9	system in accordance with rederal Rules of Civil Procedure Rule 5(0).
10	I declare under penalty of perjury that the above is true and correct.
11	Executed at Seattle, Washington, this 14th day of December, 2011.
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13	
14	
15	/s/ Christopher M. Wyant
16	Christopher M. Wyant (Signature)
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